

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

<i>In the Matter of</i>)	
)	
Advanced Methods to Target and Eliminate)	CG Docket No. 17-59
Unlawful Robocalls)	
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97
)	

Reply Comments of ADT LLC d/b/a ADT Security Services

ADT LLC d/b/a ADT Security Services (“ADT”) hereby submits these reply comments in the above-captioned proceedings to address two key issues: (1) the importance of establishing a critical calls list that includes outbound calls from alarm companies to public safety answering points (“PSAPs”), first responders and alarm-related calls to customers; and (2) requiring call blocking entities to implement a transparent and robust mechanism to promptly reverse blocking of legitimate calls. ADT is the nation’s largest alarm monitoring services company serving approximately 7.2 million customers with an array of health and safety-related services to homes and businesses. Blocking ADT’s alarm-related calls would adversely affect public health and safety.

I. Any Critical Calls List Should Include Calls from Alarm Company Central Stations

As explained in the initial comments of the Alarm Industry Communications Committee (“AICC”), alarm companies provide vital services to broad sectors of the economy, including critical facilities such as government offices, power plants, hospitals, dam and water authorities,

pharmaceutical plants, and chemical plants, as well as banks, schools and universities.¹ Alarm companies also provide an increasingly sophisticated range of home monitoring services, including health-related services capable of summoning family or emergency services in case of falls, automobile accidents or other health-related events.

Upon receiving an alarm signal, alarm company central stations attempt to contact the customer to verify the event in order to prevent sending first responders to false alarms. As noted by AICC, a number of jurisdictions now require such calls.² Trained alarm company agents then contact a PSAP or first responders as appropriate to the situation. Increasingly, ADT and other alarm companies are able to share important information about the location that aid first responders' situational awareness. These obviously critical calls should never be blocked. It is therefore crucial, as the Commission suggests, that any critical calls list include numbers used for making outbound calls from alarm central stations.³

ADT also concurs with numerous commenters that the Commission facilitate and potentially operate or oversee a single, centralized list of critical numbers.⁴ Requiring each voice service provider to maintain their own critical call list would be impractical for both the provider and the calling entities. Multiple critical calls lists may also increase the possibility of a breach, providing bad actors with a list of numbers that they could spoof. Maintaining the security of the list is paramount and ADT agrees with commenters' concerns that the list must be provided the highest possible level of security.⁵ As stated by the AICC, the alarm industry stands ready to

¹ AICC Comments at 1-2. Unless otherwise indicated, all comments cited herein are to the *Advanced Method to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor*, Declaratory Ruling and Third Further Notice of Proposed Rulemaking, CG Docket No. 17-59, WC Docket No. 17-97, FCC 19-51 (rel. June 7, 2019) (*Declaratory Ruling or Further Notice*).

² AICC Comments at 2.

³ *Further Notice* at ¶ 66.

⁴ See, e.g., App Association Comments at 6; Comcast Comments at 11-12; Larimer Emergency Telephone Authority Comments at 3-4; NCTA Comments at 11; TNS Comments at 10. See also USTelecom Comments at 11.

⁵ See, e.g., Comcast Comments at 12; Larimer Emergency Telephone Authority Comments at 3-4.

work with the Commission, industry and standards bodies to begin the work of establishing such a list.⁶

II. Call Blocking Programs Must Include Transparent and Robust Challenge

Mechanisms

A robust mechanism to challenge blocking of legitimate calls is an important complement to a critical calls list. Establishing such a list will take time and it cannot realistically include all legitimate calls that should not be blocked. Calls are being blocked and mislabeled now.⁷ It is therefore imperative that the Commission also require call blocking programs to include a mechanism to remove erroneous blocks. The Commission recognized the importance of establishing methods for callers to remove blocks on legitimate calls in the *Declaratory Ruling*, which authorized call blocking by default based on “reasonable analytics.”⁸ There, the Commission stated its belief that “a reasonable call blocking program” would include a point of contact for callers to report erroneous blocking, and it encouraged voice service providers blocking calls to notify callers that their calls were being blocked.⁹ The Commission must do more than encourage implementation. Call blocking programs, particularly if afforded safe harbors from liability, must be coupled with transparent, effective and fast mechanisms to reverse erroneous blocking. There is substantial support in the record for including a clearly-defined challenge mechanism as part of any safe harbor.¹⁰

⁶ AICC Comments at 4-5.

⁷ The AICC reports that at least one outbound alarm company central station number has been mislabeled as suspected fraud. AICC Comments at 3. Other parties have reported blocking or mislabeling of legitimate and sometimes crucial calls, such as fraud alerts. *See, e.g.*, Numeracle Comments at 2 (noting examples of critical calls being labeled as scam or spam by analytics providers); Sirius Comments at 4.

⁸ Declaratory Ruling at ¶ 38.

⁹ *Id.*

¹⁰ *See, e.g.*, AT&T Comments at 12 (requiring that a safe harbor include “a process in place to unblock legitimate calls in the event of any inadvertent blocking of such calls.”); First Orion Comments at 1-2, 10-11 (stating that a safe harbor should include “[t]he ability to quickly and effectively correct erroneous call treatment.”); NCTA Comments at 10.

An effective challenge mechanism must include real-time notification, through an intercept message or specific error code, that a call is being blocked and by whom. Entities engaged in blocking calls should be required to maintain a readily discoverable point of contact to report false positives and make public the process it will use to reverse an erroneous block, as well as commit to resolving the issue within a stated time frame. Establishing a reasonable challenge mechanism for entities engaged in blocking should not be overly burdensome. Many providers state they already have mechanisms in place to either avoid false positives or quickly rectify erroneous blocks.¹¹

CONCLUSION

For the reasons set forth above, ADT respectfully urges the Commission to include alarm company central station calls on any critical calls list and to require that all call blocking programs include a transparent, effective and fast mechanism to address erroneously blocked calls.

Respectfully submitted,

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¹¹ See, e.g., T-Mobile Comments at 5, 9; First Orion Comments at 12.